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Attorneys for Creditor

US Bank Trust National Association as Trustee of the IGLOO Series III Trust C/O BSI
Financial Services

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS - AMARILLO DIVISION

In Re: BOBBY CHARLES WATKINS, SR
AND QUEEN ESTER WATKINS
Debtor.

Case No.: 13-20402-rlj13

CHAPTER 13

REQUEST FOR SPECIAL NOTICE

TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTORS, AND ALL
INTERESTED PARTIES

PLEASE TAKE NOTICE that GHIDOTTI|BERGER, LLP, attorneys for US Bank
Trust National Association as Trustee of the IGLOO Series III Trust C/O BSI Financial
Services hereby requests special notice of all events relevant to the above referenced
bankruptcy and copies of all pleadings or documents filed in relation to the above referenced
bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy Procedure,
Rule 2002, the commencement of any adversary proceedings, the filing of any requests for
hearing, objections, and/or notices of motion, or any other auxiliary filings, as well as notice of
all matters which must be noticed to creditors, creditors' committees and parties-in-interest and

1 other notices as required by the United States Bankruptcy Code and Rules and/or Local Rules
2 of the above-referenced bankruptcy court.

3 GHIDOTTI|BERGER, LLP, requests that for all notice purposes and for inclusion in
4 the Master Mailing List in this case, the following address be used:

5 GHIDOTTI|BERGER, LLP
6 1920 Old Tustin Ave.
7 Santa Ana, CA 92705
Telephone (949) 427-2010 – Fax: (949) 427-2732
ecfnotifications@ghidottiBerger.com

8 Neither this Request for Special Notice nor any subsequent appearance, pleading, claim,
9 proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a
10 waiver of the within party's:

11 a. Right to have any and all final orders in any and all non-core matters entered
12 only after de novo review by a United States District Court Judge;

13 b. Right to trial by jury in any proceeding as to any and all matters so triable
14 herein, whether or not the same be designated legal or private rights, or in any case,
15 controversy or proceeding related hereto, notwithstanding the designation or not of such
16 matters as "core proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial
17 right is pursuant to statute or the United States Constitution;

18 c. Right to have the reference of this matter withdrawn by the United States
19 District Court in any matter or proceeding subject to mandatory or discretionary withdrawal;
20 and

21 d. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to
22 which this party is entitled under any agreements at law or in equity or under the United States
23 Constitution.

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1 All of the above rights are expressly reserved and preserved by this party without
2 exception and with no purpose of confessing or conceding jurisdiction in any way by this filing
3 or by any other participation in these matters.

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5 Dated: January 23, 2019 GHIDOTTI|BERGER, LLP
6 By: /s/ Kristin A. Zilberstein
7 Kristin A. Zilberstein, Esq.
8 Attorneys for US Bank Trust National Association
9 as Trustee of the IGLOO Series III Trust C/O BSI
10 Financial Services
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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS - AMARILLO DIVISION

In Re; BOBBY CHARLES WATKINS, SR AND) Case No.: 13-20402-rlj13
QUEEN ESTER WATKINS) CHAPTER 13
)
) **CERTIFICATE OF SERVICE**

Debtors.

CERTIFICATE OF SERVICE

I am employed in the County of Orange, State of California. I am over the age of eighteen and not a party to the within action. My business address is: 1920 Old Tustin Avenue, Santa Ana, CA 92705.

I am readily familiar with the business's practice for collection and processing of correspondence for mailing with the United States Postal Service; such correspondence would be deposited with the United States Postal Service the same day of deposit in the ordinary course of business.

On January 23, 2019 I served the following documents described as:

• **REQUEST FOR SPECIAL NOTICE**

on the interested parties in this action by placing a true and correct copy thereof in a sealed envelope addressed as follows:

(Via United States Mail)

Debtor Bobby Charles Watkins, Sr 6209 Hatfield Circle Amarillo, TX 79109	Chapter 13 Trustee Robert B. Wilson 1407 Buddy Holly Ave Lubbock, TX 79401
Joint Debtor Queen Ester Watkins 6209 Hatfield Circle Amarillo, TX 79109	US Trustee United States Trustee 1100 Commerce Street Room 976 Dallas, TX 75242
Debtor's Counsel Patrick Alan Swindell Swindell Law Firm 106 SW 7th Ave. Amarillo, TX 79101	

xx (By First Class Mail) At my business address, I placed such envelope for deposit with the United States Postal Service by placing them for collection and mailing on that date following ordinary business practices.

 Via Electronic Mail pursuant to the requirements of the Local Bankruptcy Rules of the Eastern District of California

xx (Federal) I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 23, 2019 at Santa Ana, California

/s/ David Tragarz
David Tragarz